

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF NEW YORK, et al.

Defendants.

Civil Action No.: 77-cv-343(NAM)

**NOTICE OF JOINT MOTION TO DISSOLVE
CONSENT DECREE**

PLEASE TAKE NOTICE that Plaintiff United States of America and Defendants the State of New York and the Superintendent of the New York State Police, through the undersigned counsel, will bring for hearing their Joint Motion to Dissolve Consent Decree, and for an order dismissing the case, before the Honorable Norman A. Mordue, at the U.S. District Court, Northern District of New York, James M. Hanley Federal Building, 100 S. Clinton Street, Syracuse, NY 13261, on February 18, 2015, at 10:00 a.m. or as soon thereafter as counsel may be heard.

Dated: January 15, 2015

On behalf of the United States of America

VANITA GUPTA
Acting Assistant Attorney General

DELORA L. KENNEBREW
Chief

By:

s/ John P. Buchko
JOHN P. BUCHKO D.C. Bar Number: 452745
Special Litigation Counsel
U.S. Department of Justice
950 Pennsylvania Avenue, NW
PHB 4906
Washington, DC 20530
Telephone: (202) 305-4349
Fax: (202) 514-1005
john.buchko@usdoj.gov

s/ Alicia D. Johnson
Alicia D. Johnson DC Bar Number: 494032
Senior Trial Attorney
Employment Litigation Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, NW
PHB 4906
Washington, DC 20530
Telephone: (202) 305-4349
Fax: (202) 514-1005
alicia.johnson@usdoj.gov

On behalf of the State of New York and the
Superintendent of the New York State
Police

s/ Thomas A. Capezza
Thomas A. Capezza
Counsel, New York State Police
Bar Roll Number: 503159
Division Headquarters
1220 Washington Ave.
Albany, NY 12226
Telephone: (518) 457-6137
Fax: (518) 485-1164
Email: thomas.capezza@troopers.ny.gov

s/ Lois Goland
Lois Goland NY Bar Number: 101796
Deputy Counsel
New York State Police
Division Headquarters
1220 Washington Avenue
Albany, New York 12226
(518) 457-6137
Fax: (518) 485-1164
Email: lois.goland@troopers.ny.gov

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JOINT MOTION TO DISSOLVE CONSENT DECREE

Plaintiff United States of America (the “United States”) and Defendants State of New York and the Superintendent of the New York State Police, in his official capacity (hereinafter, collectively referred to as the “State” or “Defendants”), hereby move this Court to enter an order:

1. finding that the Defendants have substantially complied with the objectives of the Final Decree (“Decree”) that was entered by the Court on October 19, 1979;
2. dissolving the Decree, and any modifications thereto, in their entirety; and
3. dismissing the case.

A memorandum in support of this Joint Motion is attached hereto.

Respectfully submitted,

On behalf of the United States of America

On behalf of the State of New York and the
Superintendent of the New York State
Police

Dated: January 15, 2015

On behalf of the United States of America

On behalf of the State of New York and the
Superintendent of the New York State
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JOHN P. BUCHKO D.C. Bar Number: 452745
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U.S. Department of Justice
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s/ Thomas A. Capezza
Thomas A. Capezza
Counsel, New York State Police
Bar Roll Number: 503159
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1220 Washington Ave.
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